

EXHIBIT A



REDACTED IN ITS ENTIRETY

EXHIBIT B



REDACTED IN ITS ENTIRETY

EXHIBIT C



REDACTED IN ITS ENTIRETY

EXHIBIT D



IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ART+COM INNOVATIONPOOL GMBH,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 14-217 (RGA)
)	
GOOGLE INC.,)	
)	
Defendant.)	

INITIAL DISCLOSURES OF GOOGLE INC.

Pursuant to Federal Rule of Civil Procedure 26(a)(1), the Local Rules of this Court, and the Court's June 17, 2014 Scheduling Order (D.I. 24), Defendant Google Inc. ("Google") hereby makes these Initial Disclosures to Plaintiff ART+COM Innovationpool GmbH ("Plaintiff").

Google submits these Initial Disclosures based upon information that Google has acquired to date based on its ongoing investigation. At this time, discovery is in its earliest stages. Google reserves the right to modify, amend, and/or supplement these disclosures as appropriate based upon further evaluation of facts and evidence in its possession and as additional evidence and information becomes available in accordance with Rule 26(e) of the Federal Rules of Civil Procedure. Google expressly does not waive attorney-client privilege, work product protection, or any other applicable privilege through these disclosures, nor does it waive its right to object on proper grounds to any discovery request relating to the subject matter of these disclosures.

DISCLOSURES PURSUANT TO FED. R. CIV. P. 26**A. Individuals Likely To Have Discoverable Information (Fed. R. Civ. P. 26(a)(1)(A)(i))**

Based on the information currently available to Google, the following individuals may have knowledge of relevant facts. All employees of Google (and its affiliates) identified below should be contacted through the undersigned counsel. In addition, Google intends for all of its former employees to be represented by the undersigned counsel. The following list should not be interpreted to be an admission that any of the identified individuals will have discoverable information.

Name	Contact Information	Summary of Information Possibly Known by Person
Pavel Mayer	On information and belief, Mr. Mayer is currently located in Berlin, Germany.	Mr. Mayer is a named inventor of U.S. Patent No. RE44,550E (the “’550 patent”). Mr. Mayer may have knowledge regarding the alleged inventions disclosed and claimed in the ’550 patent, including information about the conception, reduction to practice, and other information relating to the alleged inventions, as well as the prosecution of the ’550 patent and related patent applications. In addition, Mr. Mayer may have information regarding communications with Google.
Axel Schmidt	On information and belief, Mr. Schmidt is currently located in Berlin, Germany.	Mr. Schmidt is a named inventor of the ’550 patent. Mr. Schmidt may have knowledge regarding the alleged inventions disclosed and claimed in the ’550 patent, including information about the conception, reduction to

		practice, and other information relating to the alleged inventions, as well as the prosecution of the '550 patent and related patent applications. In addition, Mr. Schmidt may have information regarding communications with Google.
Joachim Sauter	On information and belief, Mr. Sauter can be reached at: ART+COM AG Kleisstrasse 23-26 10787 Berlin Germany	Mr. Sauter is a named inventor of the '550 patent. Mr. Sauter may have knowledge regarding the alleged inventions disclosed and claimed in the '550 patent, including information about the conception, reduction to practice, and other information relating to the alleged inventions, as well as the prosecution of the '550 patent and related patent applications. In addition, Mr. Sauter may have information regarding communications with Google.
Gerd Gruneis	On information and belief, Mr. Gruneis is currently located in Berlin, Germany.	Mr. Gruneis is a named inventor of the '550 patent. Mr. Gruneis may have knowledge regarding the alleged inventions disclosed and claimed in the '550 patent, including information about the conception, reduction to practice, and other information relating to the alleged inventions, as well as the prosecution of the '550 patent and related patent applications. In addition, Mr. Gruneis may have information regarding communications with Google.

Patrick Paulisch	On information and belief, Mr. Paulisch is currently located in Berlin, Germany.	Mr. Paulisch may have information regarding communications with Google.
Andreas Wiek	On information and belief, Mr. Wiek can be reached at: Chief Executive Officer ART+COM Innovationpool GmbH Kleisstrasse 23-26 10787 Berlin, Germany	Mr. Wiek may have information regarding communications with Google.
Detlef Andreovits	On information and belief, Mr. Andreovits can be reached at: Managing Director ART+COM Innovationpool GmbH Kleisstrasse 23-26 10787 Berlin, Germany	Mr. Andreovits s may have information regarding communications with Google. Mr. Andreovits may have knowledge regarding prosecution of the '550 patent and related patent applications.
Dirk Lusebrink	On information and belief, Mr. Lusebrink can be reached at: Head of Development ART+COM Innovationpool GmbH Kleisstrasse 23-26 10787 Berlin, Germany	Mr. Lusebrink s may have information regarding communications with Google.
ART+COM AG	On information and belief, ART+COM AG is located at: Kleiststrasse 23-26 10787 Berlin Germany Telephone: +49.30.21001-0	On information and belief, ART+COM AG is related to the Plaintiff and may have knowledge regarding the alleged inventions disclosed and claimed in the '550 patent, including information about the conception, reduction to practice, and other information relating to the alleged inventions, as well as the prosecution of the '550 patent and related patent applications. ART+COM AG may have information

		regarding communications with Google.
Pfenning, Meinig & Partner GbR	On information and belief, Pfenning, Meinig & Partner is currently located at: Theresienhöhe 13 80339 München Germany Telephone: (+49) 89-5309336	Pfenning, Meinig & Partner is a law firm that was involved in the prosecution of patent applications to the '550 patent and related patent applications, including the German priority patent application.
Marshall & Melhorn, LLC	On information and belief, Marshall & Melhorn is currently located at: Marshall & Melhorn, LLC Four Seagate Eighth Floor Toledo, OH 43604 Telephone: (419) 249-7100	Marshall & Melhorn is a law firm that was involved in the prosecution of the patent applications that led to the issuance of the '550 patent and related applications.
Phillip S. Oberlin	On information and belief, Mr. Oberlin is currently located at: 8612 Stone Oak Drive Toledo, OH 43601 Telephone: (419) 861-1549	Mr. Oberlin was involved in the prosecution of the patent applications that led to the issuance of the '550 patent and related patent applications. Mr. Oberlin may have further information regarding the '550 patent, including prosecution history, prior art, invalidity, unenforceability, conception, reduction to practice, construction of the claims, and embodiments of the '550 patent and related patent applications.
Brian E. Szymanski	On information and belief, Mr. Szymanski is currently located at: Interfacial Solutions, LLC 949 Antler Court River Falls, WI 54022	Mr. Szymanski was involved in the prosecution of the patent applications that led to the issuance of the '550 patent and related patent applications. Mr. Szymanski may have further information

	Telephone: (715) 425-7957	regarding the '550 patent, including prosecution history, prior art, invalidity, unenforceability, conception, reduction to practice, construction of the claims, and embodiments of the '550 patent and related patent applications.
Patrick D. Floyd	On information and belief, Mr. Floyd is currently located at: Fay Sharpe LLP The Halle Building, 5th Floor 1228 Euclid Ave. Cleveland, OH 44115 Telephone: (216) 363-9000	Mr. Floyd was involved in the prosecution of the patent applications that led to the issuance of the '550 patent and related patent applications. Mr. Floyd may have further information regarding the '550 patent, including prosecution history, prior art, invalidity, unenforceability, conception, reduction to practice, construction of the claims, and embodiments of the '550 patent and related patent applications.
Christie, Parker & Hale, LLP	On information and belief, Christie, Parker & Hale is currently located at: 655 North Central Avenue, Suite 2300 Glendale, California 91203-1445 Telephone: (626) 795-9900	Christie, Parker & Hale is a law firm that was involved in the prosecution of the patent applications that led to the issuance of the '550 patent and related patent applications.
Wesley W. Monroe	On information and belief, Mr. Monroe is currently located at: Christie, Parker & Hale, LLP 655 North Central Avenue Suite 2300 Glendale, California 91203 Telephone: (626) 795-9900	Mr. Monroe was involved in the prosecution of the patent applications that led to the issuance of the '550 patent and related patent applications. Mr. Monroe may have further information regarding the '550 patent, including prosecution history,

		prior art, invalidity, unenforceability, conception, reduction to practice, construction of the claims, and embodiments of the '550 patent and related patent applications.
Baker Botts LLP	On information and belief, Baker Botts is currently located at: Baker Botts LLP One Shell Plaza 910 Louisiana Street Houston, Texas 77002 Telephone: (713) 229-1234	Baker Botts is a law firm that was involved in the prosecution of the patent application that led to the issuance of the '550 patent and related patent applications.
Paul R. Morico	On information and belief, Mr. Morico is currently located at: Baker Botts LLP One Shell Plaza 910 Louisiana Street Houston, Texas 77002 Telephone: (713) 229-1732	Mr. Morico was involved in the prosecution of the patent application that led to the issuance of the '550 patent and related patent applications. Mr. Morico may have further information regarding the '550 patent, including prosecution history, prior art, invalidity, unenforceability, conception, reduction to practice, construction of the claims, and embodiments of the '550 patent and related patent applications.
Association for Computing Machinery's Special Interest Group on Computer Graphics and Interactive Techniques ("ACM-SIGGRAPH")	On information and belief, ACM-SIGGRAPH is currently located at: 2 Penn Plaza Suite 701 New York, NY 10121 Telephone: (212) 626-0500	ACM-SIGGRAPH may have knowledge regarding the alleged inventions disclosed and claimed in the '550 patent, including information about the public use, conception, reduction to practice, and other information relating to the alleged inventions.
Silicon Graphics International Corp. ("Silicon Graphics")	On information and belief, Silicon Graphics is currently	Silicon Graphics may have knowledge regarding prior art

	located at: 900 North McCarthy Blvd. Milpitas, CA 95035 Telephone: (669) 900-8000	to the '550 patent. Silicon Graphics may have knowledge regarding the alleged inventions disclosed and claimed in the '550 patent, including information about the conception, reduction to practice, and other information relating to the alleged inventions.
SRI International ("SRI")	On information and belief, SRI is currently located at: 333 Ravenswood Avenue Menlo Park, CA94025 United States Telephone: (650) 859-2000	SRI may have knowledge regarding prior art to the '550 patent.
Stephen Lau, Jr.	Mr. Lau is to be contacted only through Google's counsel of record.	Mr. Lau may have information regarding prior art to the '550 patent.
Peter Birch	Mr. Birch is to be contacted only through Google's counsel of record.	Mr. Birch has knowledge regarding product development and financial/marketing aspects of the accused instrumentalities.
Evan Parker	Mr. Parker is to be contacted only through Google's counsel of record.	Mr. Parker has knowledge regarding the structure, function, and operation of aspects of the accused instrumentalities.
John Rohlf	Mr. Rohlf is to be contacted only through Google's counsel of record.	Mr. Rohlf has knowledge regarding the structure, function, and operation of aspects of the accused instrumentalities.
Authors, inventors, and others having knowledge of prior art.	Authors, inventors, and others having knowledge of prior art may be contacted through their respective counsel.	Authors, inventors, and others having knowledge of prior art will have knowledge regarding prior art that may be relevant to the invalidity or unenforceability of the '550

		patent
Google designated representative(s).	Google's designated representative(s) shall be contacted only through Google's counsel of record.	Designated representative(s) will have knowledge regarding the structure, function, and operation of Google Earth; sales and marketing relating to Google Earth; and financial data relating to Google Earth.

In addition to the foregoing, Google identifies and incorporates by reference the following additional persons who may have knowledge of facts relevant to this suit:

(1) Any and all persons identified by the Plaintiff in its Initial Disclosures in this litigation.

(2) Any custodian of records or other person who may be required to establish authenticity and/or admissibility of documents, including without limitation prior art.

(3) Individuals having knowledge of the prosecution of the '550 patent and related patent applications, including, without limitation, any prosecuting agents or attorneys.

(4) Individuals having knowledge of any prior art manufacture, use, sale, offer to sell, importation, or invention relevant to the subject matter of the '550 patent.

(5) Individuals having knowledge of any license to the '550 patent, any offer to license the '550 patent, or any sale or offer to sell of the '550 patent.

By indicating the general subject matter of information these individuals may have, Google is in no way limiting its right to call any individual(s) listed to testify concerning other subject(s). Google reserves the right to disclose additional individuals whom Google may use to support its claims or defenses based on information learned during the course of this litigation.

B. Documents In Google's Possession, Custody, Or Control That Google May Use To Support Its Claims Or Defenses (Fed. R. Civ. P. 26(a)(1)(A)(ii))

Google is in possession of the following categories of documents that Google may use to support its claims or defenses: information relating to the structure, function, and operation of the accused instrumentalities; information relating to the invalidity of the '550 patent; information relating to the unenforceability of the '550 patent; and information relating to Google and its products and services, including marketing and financial information. Google also may rely on documents in the custody, possession, or control of the Plaintiff or one or more third parties.

Google reserves the right to assert a claim of privilege or immunity and withhold from production any documents, whether or not included above, that are protected from discovery by the attorney-client privilege, work product immunity, or any other privilege or immunity. Google further reserves the right to disclose additional documents that Google may use to support its claims or defenses based on information discovered during the course of this litigation.

C. Computation Of Any Category Of Damages Claimed By The Disclosing Party (Fed. R. Civ. P. 26(a)(1)(A)(iii))

At this time, Google seeks to recover its reasonable costs and expenses of litigation, including attorneys' fees and expert witness fees. Google also seeks an order that this case is exceptional. Google is not yet certain as to the amount of fees and costs it will seek.

D. Applicable Insurance Agreements (Fed. R. Civ. P. 26(a)(1)(A)(iv))

At this time, Google has not identified any insurance agreements under which an insurance business may be liable to satisfy all or part of a judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment. Google's investigation is ongoing, and Google will supplement this disclosure as appropriate.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Jack B. Blumenfeld

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June 23, 2014

CERTIFICATE OF SERVICE

I, hereby certify that on June 23, 2014, copies of the foregoing were caused to be served upon the following in the manner indicated:

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EXHIBIT E



REDACTED IN ITS ENTIRETY

EXHIBIT F



REDACTED IN ITS ENTIRETY